

ENVIRONMENTAL JUSTICE AND LEAD (Pb)

Discussion Paper for the Environmental Justice and Community Revitalization Council

BUILD ON PAST WORK

EPA has a long history of integrating environmental justice (EJ) into our work. We have demonstrated meaningful and measurable environmental and public health outcomes in minority, low-income, tribal and indigenous communities (areas of EJ concern). The following examples, as well as many others, provide lessons for future work.

- **Boston:** Multiple joint targeting efforts reduced the number of new childhood lead poisoning cases from 1,123 cases in 2001 to 163 cases in 2010.
- **Omaha Lead Superfund Site:** The percentage of children with elevated blood lead levels in the 27-square mile area (over 175,000 persons) around the site decreased from 25% in 1999 to 0.3% in 2017.
- **Region 9:** 38 of the 44 small public water systems that exceeded the lead action level in August 2016 were brought into compliance by the end of FY2017.

CONTINUE THIS WORK THROUGH REGIONAL LEAD ACTION PLANS

All EPA Regions will implement the National Lead Strategy through Regional Lead Action Plans. They should integrate environmental justice into this work in a manner that helps EPA work with partners to achieve shared goals of advancing EJ, improving public health, and revitalizing communities. Many Regions are already working on this integration, as well as on the processes and partnerships needed to support the work. Regional experience, networks and approaches can inform the National Lead Coordinator in developing a national strategic framework that integrates EJ and community revitalization. Key themes identified by Regions include:

1. **Focus on Tangible and Measurable Results:** We should focus our efforts on places where we can effectively contribute to meaningful and measurable environmental and public health outcomes in more efficient and robust ways through all appropriate media programs. Regions should be encouraged to consider this important factor when selecting the Administrator's initial ten areas for focused action on lead as well as for other initiatives.
2. **Targeting for High Risk Populations:** Scientific consensus exists that race, poverty and age of housing are the most critical indicators consistently highly predictive for lead exposure nationally. Consistent with environmental justice screening approaches, we will also consider cumulative impacts from multiple media in targeting for lead risk. Work with federal agencies, states and local government is essential for obtaining data needed for identifying hotspots for action and developing lead targeting tools useful for EPA programs and external partners. Over time, we should integrate existing targeting and modeling efforts (e.g., Region 5, OCSPP, ORD) to develop a OneEPA lead targeting tool, building on existing platforms such as EJSCREEN. Targeting takes place on a program-specific basis, within Regions and on a community scale.
3. **States and Cooperative Federalism:** Addressing lead exposure in a multi-media, multi-agency fashion is an ideal opportunity to practice a holistic approach to cooperative federalism that integrates public health and environmental programs across federal agencies, states, local governments, tribes and communities at both the vertical and horizontal levels. Our strategy will use states as a starting point, as they are critical to advancing our EJ mission and overall environmental governance. Initial engagement with states has surfaced working together to target areas of high risk with both federal and local data, joint planning and governance in development of EPA Regional lead action plans, and identification of areas for joint priority action as key issues. Every Region should engage in a proactive state engagement strategy that draws on a collective vision of best practices for engaging states and supports joint planning and shared governance of projects.
4. **Community-Driven Work:** Community-driven work is an incredibly robust and vital area that can be tied to our holistic approach to cooperative federalism. It enables proactive leadership from community groups, academia, philanthropies and other civil society groups. Every truly successful solution around lead has a strong community leadership element. EPA resources can include citizen science, EJ and other grants, technical assistance, and other resources – all taking lessons from lead successes such as Boston, MA, Omaha, NE, and Newburgh, NY. This work provides opportunities to promote innovative approaches to address lead through healthy homes, job training and creation, sustainable materials reuse and health care mechanisms. Attention should be given to a variety of contexts – including urban, rural and tribal.
5. **Communications and Engagement with Populations of Concern:** EPA will work to support the Federal Lead Strategy's outreach and communications goal through engagement with tribes and indigenous populations, key community-based projects, EJ organizations and stakeholder groups. One example is groups addressing retail outlets with products of high lead content that disproportionately impact minority and low-income populations.